

Amir J. Goldstein, Esq. (Bar No. 255620)  
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2008 DEC - 1 PM 12:50  
CLERK OF DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
BY [Signature]

FILED

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

RINATTE HAMI, individually and on  
behalf of others similarly situated,

Plaintiff,

v.

WINN LAW GROUP,

Defendant.

CASE NO.:

**SACV08-1355 CJC MLGx**

COMPLAINT

Plaintiff, by and through her attorney, Amir J. Goldstein, Esq., as and for her complaint  
against the Winn Law Group as follows:

**INTRODUCTION**

1. This is an action for damages brought by an individual consumer and on behalf of  
a class for defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et*  
*seq.* ("FDCPA") and the Rosenthal Fair Debt Collection Practices Act which prohibits debt  
collectors from engaging in abusive, deceptive and unfair practices.

**PARTIES**

2. Plaintiff is a natural person residing in Studio City, California.

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1           11. If you dispute the validity of this debt, or any portion thereof, we invite you to  
2 explain why....”

3           12. Said language contradicts and/or overshadows the consumers right to dispute the  
4 debt for 30 days as required by law in that it directs the consumer to “explain why” she disputed  
5 the debt.

6           13. Said language falsely implies that legal action is imminent, once the firm has an  
7 opportunity to review the case, however, the Defendant has no intention of actually filing suit.

8           14. Said language falsely implies that the Defendant is “investigating the validity of”  
9 their client’s claim, when in fact no such investigation takes place, and any investigation should  
10 have taken place prior to Defendants communicating with the consumer.

11           15. Said language fails to identify the true identity of the original creditor.

12           16. That on August 29, 2008, within the 30 days dispute period, Defendant sent  
13 another notice to the plaintiff. A copy of said letter is attached hereto and made part hereof.

14           17. Said letter advised the consumer that Defendants have now had an opportunity to  
15 review the file and directs the consumer to contact the Defendant personally.

16           18. That, because the second letter was sent within plaintiff’s 30-day dispute period,  
17 said language overshadows the notice in the first letter.

18           19. That on both the first and second letter to the plaintiff, the creditor was falsely  
19 listed as Fair Collections and Outsourcing.

20           20. That each letter arbitrarily inflates the debt amount with interest that is unlawful  
21 and unwarranted.

22           21. Defendant’s conduct violates 15 U.S.C. 1692 et seq., including but not limited to  
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1 Subsections (d),(e), (g) and (f) in that the representations made by the defendant are false,  
2 confusing, misleading, deceptive, unfair and fail to advise the consumer of his legal rights as  
3 required by law.

4 22. That as per 15 U.S.C. § 1692 et seq. and as a result of the above violation,  
5 defendant is liable to the plaintiff and all members similarly situated for statutory damages in an  
6 amount to be determined at the time of trial but not less than \$1,000.00 per violation, plus costs  
7 and attorney's fees.

8 **AS AND FOR A SECOND CAUSE OF ACTION ON BEHALF OF THE CLASS**

9 23. Plaintiff realleges paragraphs 1 through 25 as if fully restated herein.

10 24. The Rosenthal Fair Debt Collection Practices Act (Rosenthal Act), California  
11 Civil Code § 1788, et seq., prohibits unfair and deceptive acts and practices in the collection of  
12 consumer debts.

13 25. By their acts and practices as hereinabove described, the Defendants have violated  
14 the Rosenthal Act as follows, without limitation:

15 a) Generating form letters to consumer containing negligent or wanton misrepresentations about  
16 the identity of the creditors

17 b) By generating form letters that contain language which contradicts and overshadows the  
18 consumer rights

19 c) By falsely threatening the consumer with legal action that can not legally be  
20 taken and/or is not actually intended to be taken.

21 d) By unlawfully and arbitrarily inflating the debt amount with interest fees that have no basis in  
22 law or contract.

23 26. Pursuant to § 788.30 of the Rosenthal Act, Plaintiff is entitled to recover her  
24 actual damages sustained as a result of the Defendants' violations of the Rosenthal Act. Such  
25 damages include, without limitation, statutory damages, any actual damages sustained, other  
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1 resulting monetary losses and damages, and emotional distress suffered by Plaintiff, which  
2 damages are in an amount to be proven at trial.

3 27. In addition, because the Defendants' violations of the Rosenthal Act were  
4 committed willingly and knowingly, Plaintiff is entitled to recover, in addition to her actual  
5 damages, penalties of at least \$1,000 per violation as provided for in the Act.

6 28. Pursuant to § 1788.30(c) Rosenthal Act, Plaintiff is entitled to recover all  
7 attorneys' fees, costs and expenses incurred in the bringing of this action.

8 **CLASS ALLEGATIONS**

9 29. The first cause of action is brought on behalf of plaintiff and the members of a  
10 class.

11 30. The class consists of consumers who received the same form letter(s), as did the  
12 plaintiff.

13 31. The Class consists of all persons whom Defendant's records reflect resided in the  
14 State of California and who were sent a collection letter (a) bearing the defendant's letterhead in  
15 substantially the same form as the letter sent to the plaintiff on or about August 6, 2008, and  
16 August 29, 2008, (b) the collection letter(s) was sent to a consumers seeking payment of a  
17 consumer debt; and (c) the collection letter was not returned by the postal service as undelivered,  
18 (d) and that the letter contained violations of 15 U.S.C. § 1692 d, e, g and f for contradicting and  
19 confusing the consumer as to his/her rights and falsely representing the name of the original  
20 creditor of the alleged debt, falsely threatening legal action that is not intended to be taken and  
21 unlawfully inflating the debt amount.

22 32. Pursuant to Federal Rule of Civil Procedure 23, a class action is appropriate and  
23 preferable in this case because:

24 (A) Based on the fact that the collection letters that are at the heart of this litigation  
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1 are mass-mailed and computer generated form letters, the class is so numerous that joinder of all  
2 members is impracticable.

3 (B) There are questions of law and fact common to the class and these questions  
4 predominate over any questions affecting only individual class members. The principal question  
5 presented by this claim is whether the Defendant violated the FDCPA by failing to follow  
6 appropriate procedures.

7 (C) The only individual issue is the identification of the consumers who received the  
8 letters, (*i.e.* the class members), a matter capable of ministerial determination from the records of  
9 Defendant.

10 (D) The claims of the plaintiff are typical of those of the class members. All are based  
11 on the same facts and legal theories.

12 (E) The plaintiff will fairly and adequately represent the class members' interests. The  
13 plaintiff has retained counsel experienced in bringing class actions and collection-abuse claims.  
14 The plaintiff's interests are consistent with those of the members of the class.

15 33. A class action is superior for the fair and efficient adjudication of the class  
16 members' claims. Congress specifically envisions class actions as a principal means of enforcing  
17 the FDCPA. 15 U.S.C. 1692(k). The members of the class are generally unsophisticated  
18 individuals, whose rights will not be vindicated in the absence of a class action. Prosecution of  
19 separate actions by individual members of the classes would create the risk of inconsistent or  
20 varying adjudications resulting in the establishment of inconsistent or varying standards for the  
21 parties and would not be in the interest of judicial economy.

22 34. If the facts are discovered to be appropriate, the plaintiff will seek to certify a  
23 class pursuant to Rule 23(b)(3) of the Federal Rules of Civil Procedure.

24 35. Collection letters, such as those sent by the defendant are to be evaluated by the  
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1 objective standard of the hypothetical "least sophisticated consumer."

2 36. Defendant violated the FDCPA. Defendant's violations include, but are not  
3 limited to, the following:(g), (e), and (f):

4 (a) Defendant violated 15 U.S.C. § 1692f by employing unfair tactics in  
5 attempt to collect a debt;

6 (b) Defendant violated 15 U.S.C. § 1692e by using false representations  
7 and deceptive means in an attempt to collect a debt;

8 (c) Defendant violated 15 U.S.C. § 1692g by contradicting plaintiff's rights.

9 (d) Defendant violated 15 U.S.C. § 1692d by harassing the plaintiff.  
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12 **WHEREFORE**, plaintiff respectfully prays that judgment be entered against defendant  
13 in the amount of:

14 (a) Statutory damages pursuant to 15 U.S.C. § 1692k in an amount to be determined  
15 at the time of trial on behalf of the class on the first cause of action.

16 (b) Statutory damages pursuant to Civil Code §1788.30 et seq., as to the second cause  
17 of action.

18 (c) Costs and reasonable attorney's fees pursuant to 15 U.S.C. § 1692k and Civil  
19 Code §1788.30, et seq.

20 (d) For such other and further relief as may be just and proper.  
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1 Dated: November 24, 2008

Amir J. Goldstein, Esq.

2  
3  
4 

Amir J. Goldstein, Esq.

**Attorney for Plaintiff**

5455 Wilshire Boulevard, Suite 914

Los Angeles, CA 90036

Tel 323.937.0400

Fax 866.288.9194



**BRIAN N. WINN**

**A PROFESSIONAL CORPORATION**

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Toll Free Telephone: 866-494-6674  
FAX: (714) 446-6680

E-MAIL: [CustServ@winlawgroup.com](mailto:CustServ@winlawgroup.com)

**August 6, 2008**

08-32929-0

Brian N. ~~Winn~~

**IMPORTANT CONSUMER NOTICES SET FORTH ON THE BACKSIDE OF  
THIS DOCUMENT. PLEASE READ.**

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MALCA-AMIT USA-LAX

PAGE 01/01

BRIAN N. WINN

## WINN LAW GROUP

LAURA MCCARTHY HOALST  
JOHN R. GORDON  
JONATHAN B. KLEIN  
NAOMI S. RUST  
WILLIAM J. EDWARDS

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E-MAIL: [CustServ@winnlawgroup.com](mailto:CustServ@winnlawgroup.com)

|||||

August 29, 2008

Rinatte Hami  
Apt 2213  
10993 Bluffsides Dr  
Studio City CA 91604-4451

08-32929-0 (pcl)

RE: Creditor:	FAIR COLLECTIONS AND OUTSOURCING
Account Number:	XXXXXXXX1147
Principal Due on Account:	\$2,132.31
Interest Due on Account:	\$123.85 through August 29, 2008
Total Due as of August 29, 2008:	\$2,256.16
Name of Debtor:	RINATTE HAMI

Dear Sir/Madam:

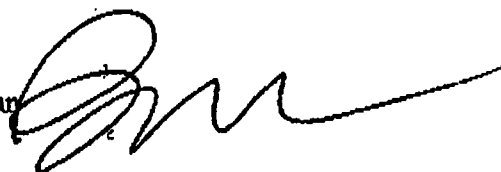
**THIS LAW FIRM IS A DEBT COLLECTOR, AS DEFINED BY 15 U.S.C. §1692(a)(6), AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED BY US WILL BE USED FOR THAT PURPOSE.**

After reviewing this file, it is my belief that it is in the best interest of both yourself and my client that you call our office at (714) 388-3080 or toll-free 866-494-6674 and speak with your representative, Negotiator @ ext. 293, to discuss this matter personally.

Please call as soon as possible to resolve this matter.

Your anticipated cooperation and courtesy is appreciated.

Brian Winn



**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> ) Rinatte Hami, individually and for other similarly situated	<b>DEFENDANTS</b> Winn Law Group 110 East Wilshire Avenue, Suite 212 Fullerton, CA 92832-1960
<b>(b) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  Amir J. Goldstein, Esq. 5455 Wilshire Boulevard, Suite 914 Los Angeles, CA 90036 <div style="text-align: right; font-size: 1.2em; font-weight: bold;">323 937 0400</div>	Attorneys (If Known)

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

**IV. ORIGIN** (Place an X in one box only.)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify):	<input type="checkbox"/> 6 Multi-District Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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**V. REQUESTED IN COMPLAINT:** **JURY DEMAND:** ☒ Yes   ☐ No (Check 'Yes' only if demanded in complaint.)

**CLASS ACTION** under F.R.C.P. 23: ☒ Yes   ☐ No     **MONEY DEMANDED IN COMPLAINT:** \$ \_\_\_\_\_

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

**VII. NATURE OF SUIT** (Place an X in one box only.) *Violation of FDCA*

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <div style="background-color: #cccccc; text-align: center; font-weight: bold;">REAL PROPERTY</div> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<div style="background-color: #cccccc; text-align: center; font-weight: bold;">PERSONAL INJURY</div> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <div style="background-color: #cccccc; text-align: center; font-weight: bold;">IMMIGRATION</div> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<div style="background-color: #cccccc; text-align: center; font-weight: bold;">PERSONAL PROPERTY</div> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <div style="background-color: #cccccc; text-align: center; font-weight: bold;">BANKRUPTCY</div> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <div style="background-color: #cccccc; text-align: center; font-weight: bold;">CIVIL RIGHTS</div> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <div style="background-color: #cccccc; text-align: center; font-weight: bold;">FORFEITURE/PENALTY</div> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <div style="background-color: #cccccc; text-align: center; font-weight: bold;">PROPERTY RIGHTS</div> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <div style="background-color: #cccccc; text-align: center; font-weight: bold;">SOCIAL SECURITY</div> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <div style="background-color: #cccccc; text-align: center; font-weight: bold;">FEDERAL TAX SUITS</div> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

SACV08-1355

**FOR OFFICE USE ONLY:** Case Number: \_\_\_\_\_

**AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.**

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA**  
**CIVIL COVER SHEET**

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): \_\_\_\_\_

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or  
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or  
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.  
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.  
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Orange	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.  
**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

**Note: In land condemnation cases, use the location of the tract of land involved.**

X. SIGNATURE OF ATTORNEY (OR PRO PER): \_\_\_\_\_

Date 11/24/08

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

**Key to Statistical codes relating to Social Security Cases:**

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Cormac J. Carney and the assigned discovery Magistrate Judge is Marc Goldman.

The case number on all documents filed with the Court should read as follows:

**SACV08- 1355 CJC (MLGx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

☐ **Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

☒ **Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

☐ **Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Rinatte Hami, individually and for others similarly  
situated,

PLAINTIFF(S)

v.

Winn Law Group

DEFENDANT(S).

CASE NUMBER

**SACV08-1355** CJC MLG

**SUMMONS**

TO: DEFENDANT(S): Winn Law Group

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Amir J. Goldstein, whose address is 5455 Wilshire Boulevard, Suite 914, Los Angeles, CA 90036. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

**LARFEE HORN**

Dated: DEC - 1 2008

By: \_\_\_\_\_

Deputy Clerk



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

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